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1776 K STREET, N. W.  
WASHINGTON, D. C. 20006  
(202) 429-7000

ORIGINAL

JEFFREY S. LINDER  
(202) 429-7384

DOCKET FILE COPY ORIGINAL FACSIMILE

(202) 429-7049  
TELEX 248349 WYRN UR

November 18, 1994

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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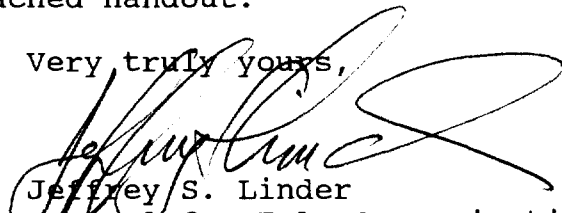
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Ex Parte Meeting in Docket No. 94-1

Dear Mr. Caton:

This is to advise you that on November 18, I met with Richard Metzger and Ana Gomez of the Common Carrier Bureau, on behalf of Tele-Communications Association, to discuss the matters contained in the attached handout.

Very truly yours,

  
Jeffrey S. Linder  
Counsel for Tele-Communications  
Association

JSL:rw

Enclosure

cc: A. Richard Metzger, Jr. (w/o)  
Ana Gomez

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## **FCC POLICIES CAN PROTECT SERVICE QUALITY**

### **Background**

- The FCC's service quality monitoring program has improved markedly since 1990 -- particularly by recognizing the benefits of "benchmarking"
- TCA's Service Quality Survey shows overall satisfaction with service quality, but also reveals certain danger signs:
  - increases in held orders
  - decreased expertise of service personnel
  - inadequate response to trouble reports and outages
  - significant disparities in service levels and availability between urban and rural areas
- Continued attention to service quality is needed because of LEC layoffs -- at least 35,000 since 1990, with 63,000 more announced by 1997

### **Service Quality Monitoring Should Be Enhanced in Two Respects**

- **Geographic differences**
  - 41 percent of U S West respondents and 25 percent of Pacific Bell respondents cited major disparities between urban and rural areas -- disparities that are masked by the current level of aggregation
  - The uneven development of competition likely will increase disparities between urban and rural areas

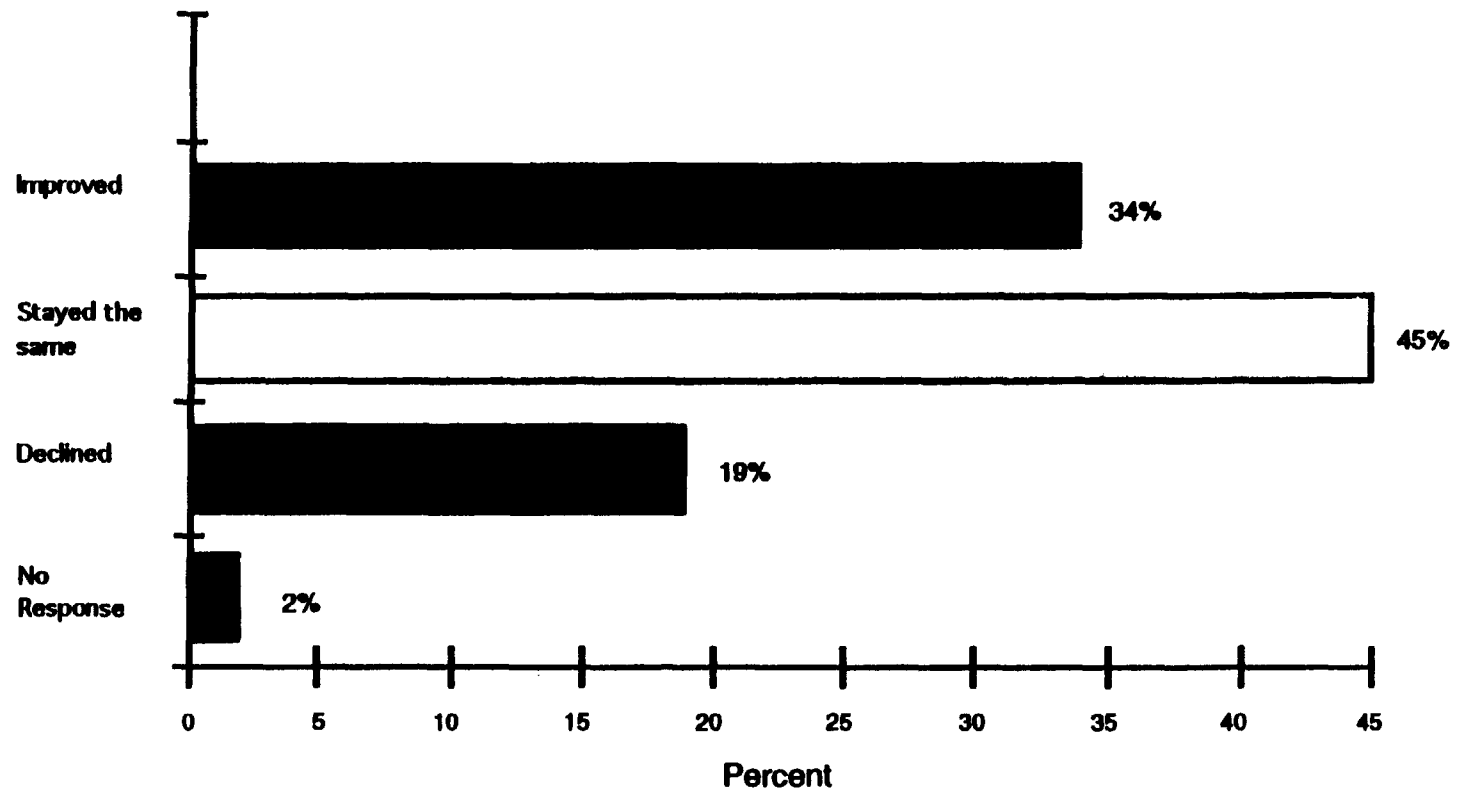
- LECs should provide exception reporting of wire centers that fall within the lowest ten percent in actual performance in any key parameter for three consecutive quarters
- LECs should report any MSA or non-MSA that is in the lowest quartile in deployment of key NII-related technologies (as supported by Pacific Bell), and if any area is listed for four consecutive quarters, the LEC should disclose its plans for deploying more modern technology.
- Data transmission quality
  - Data accounts for 14 percent of all traffic and is growing rapidly
  - High quality data transmission is important for all users — not just big business
  - High quality data transmission is essential for many NII-related applications, including digital libraries, telemedicine, and electronic document interchange
  - Non-intrusive means exist for measuring availability, errored seconds, and severely errored seconds

### **Service Quality Monitoring Is Critical During the Transition to Competition**

- As noted above, the uneven development of competition will exacerbate existing disparities
- Competition will spur additional lay-offs and cost-cutting
- Availability of comparative information on performance enhances the benefits of competition

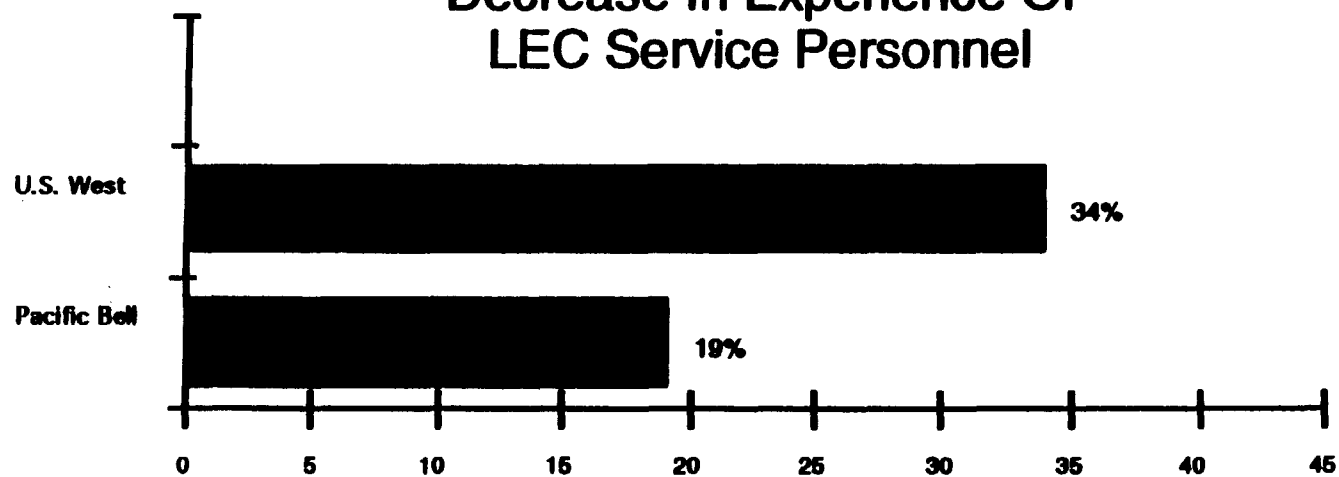
# KEY FINDINGS FROM TCA SERVICE QUALITY SURVEY (144 QUALIFIED RESPONDENTS)

Overall Service Quality (1994 vs. 1990)

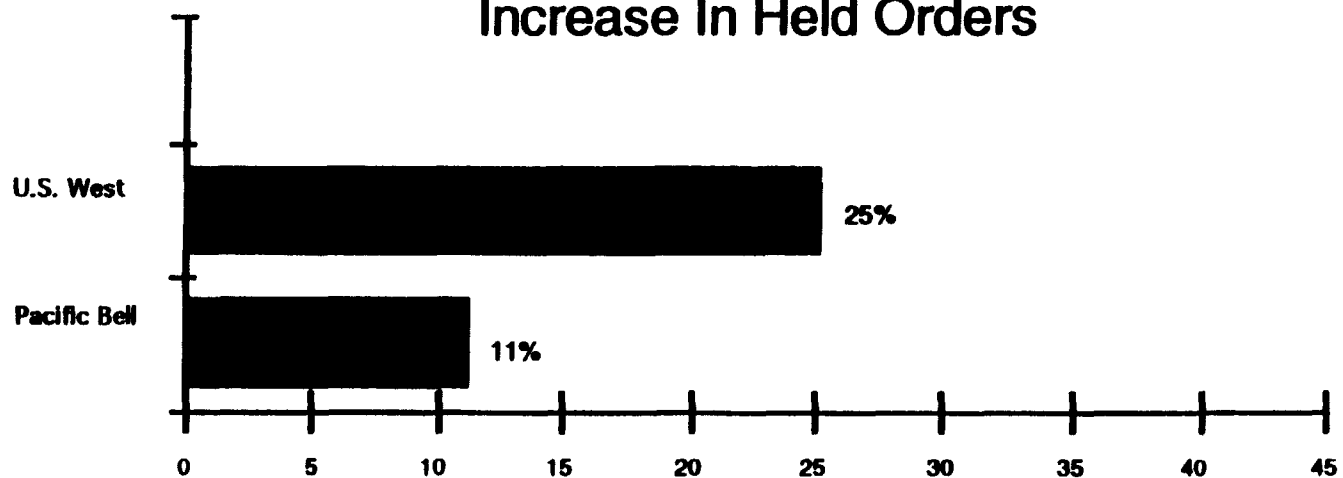


# DANGER SIGNALS

## Decrease In Experience Of LEC Service Personnel

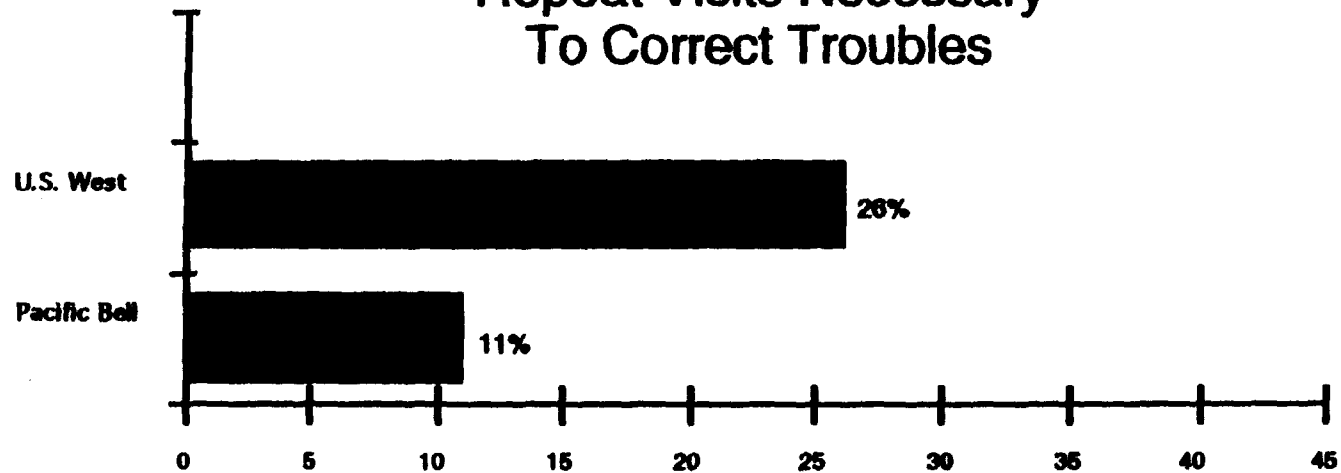


## Increase In Held Orders

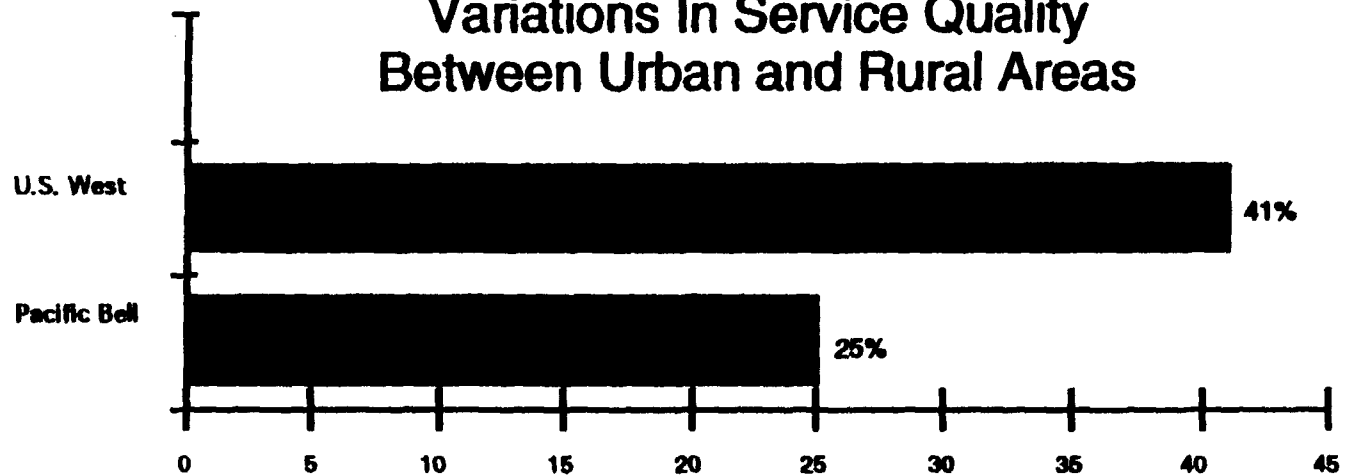


# DANGER SIGNALS

## Repeat Visits Necessary To Correct Troubles



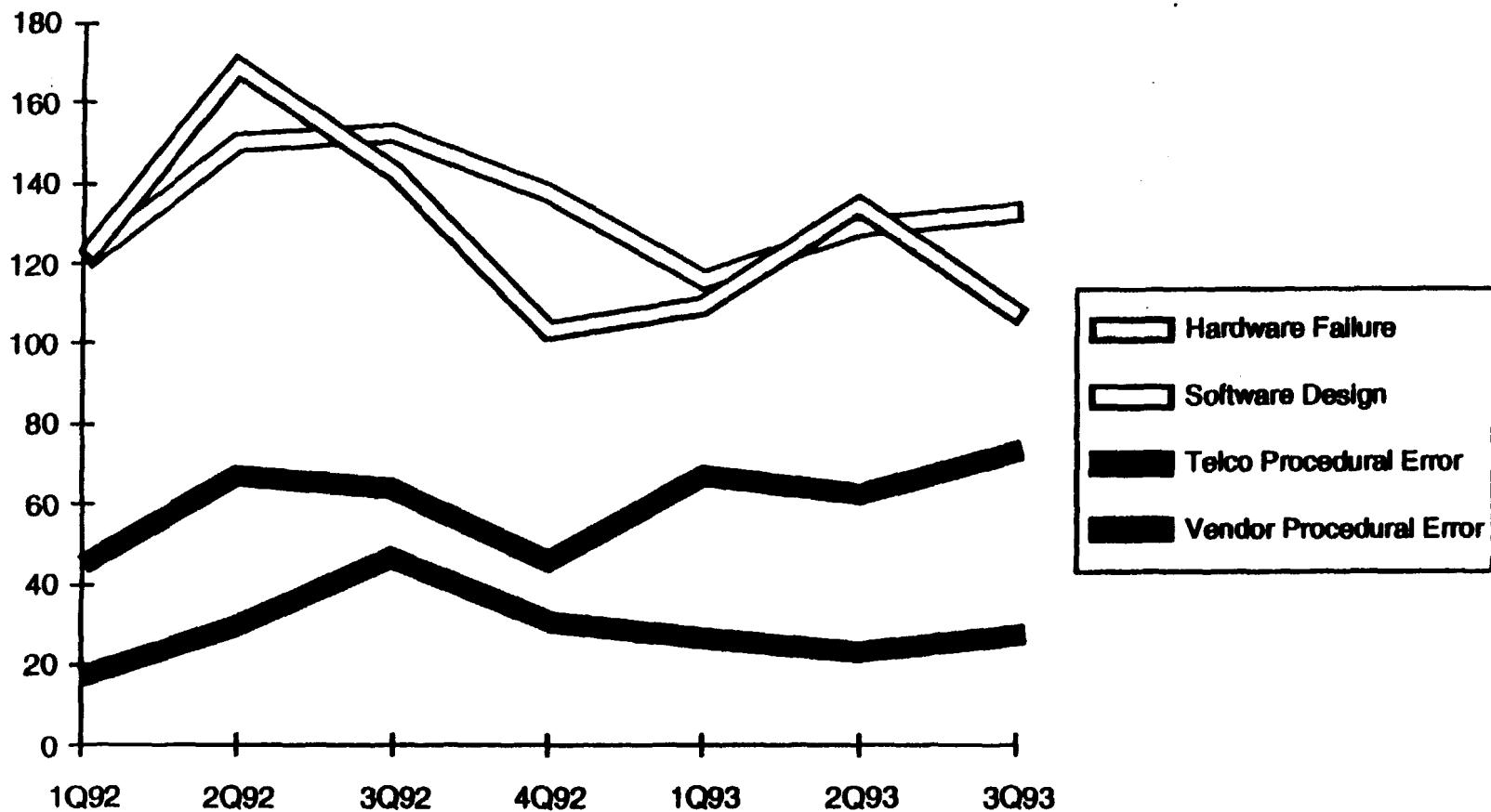
## Variations In Service Quality Between Urban and Rural Areas



## **RBOC EMPLOYMENT**

| <b>Carrier</b>           | <b>Layoffs<br/>Since 1990</b> | <b>Planned Layoffs<br/>1994-1997</b> |
|--------------------------|-------------------------------|--------------------------------------|
| <b>Ameritech</b>         | <b>4,800</b>                  | <b>10,000</b>                        |
| <b>Bell Atlantic</b>     | <b>6,000</b>                  | <b>0</b>                             |
| <b>BellSouth</b>         | <b>4,250</b>                  | <b>10,200</b>                        |
| <b>NYNEX</b>             | <b>1,900</b>                  | <b>22,000</b>                        |
| <b>Pacific Bell</b>      | <b>14,000</b>                 | <b>10,000</b>                        |
| <b>Southwestern Bell</b> | <b>3,860</b>                  | <b>1,500</b>                         |
| <b>U S West</b>          | <b>0</b>                      | <b>9,000</b>                         |
| <b>Total:</b>            | <b>34,810</b>                 | <b>62,700</b>                        |

# PREDOMINANT CAUSES OF UNSCHEDULED LOCAL SWITCH DOWNTIME



# **LEC EXPERIENCE WITH LOCAL SWITCH OUTAGES**

## **A. Events/Million Access Lines (Ranked from fewest to most)**

### **1st Quarter 93**

Pacific Telesis (0.41)  
Bell Atlantic  
U S West  
NYNEX  
Ameritech  
SW Bell  
GTE  
BellSouth  
Contel  
United (14.47)

### **2nd Quarter 93**

Bell Atlantic (0.94)  
Pacific Telesis  
NYNEX  
Ameritech  
SW Bell  
BellSouth  
U S West  
GTE  
United  
Contel (18.25)

### **3rd Quarter 93**

Pacific Telesis (0.55)  
Bell Atlantic  
U S West  
Ameritech  
NYNEX  
SW Bell  
BellSouth  
GTE  
United  
Contel (25.86)

# **LEC EXPERIENCE WITH LOCAL SWITCH OUTAGES**

## **B. Average Duration (Ranked from shortest to longest)**

### **1st Quarter 93**

Pacific Telesis  
BellSouth  
Bell Atlantic  
SW Bell  
Ameritech  
U S West  
NYNEX  
United  
GTE  
Contel

### **2nd Quarter 93**

Pacific Telesis  
Bell Atlantic  
Ameritech  
BellSouth  
SW Bell  
GTE  
NYNEX  
United  
Contel  
U S West

### **3rd Quarter 93**

BellSouth  
Bell Atlantic  
Ameritech  
SW Bell  
NYNEX  
GTE  
U S West  
Contel  
United  
Pacific Telesis